

To: Beeler, Cindy[Beeler.Cindy@epa.gov]; Rothery, Deirdre[Rothery.Deirdre@epa.gov]; Smith, Claudia[Smith.Claudia@epa.gov]; Dresser, Chris[Dresser.Chris@epa.gov]; Gilbert, Alexas[Gilbert.Alexas@epa.gov]
Cc: Daly, Carl[Daly.Carl@epa.gov]
From: Ostendorf, Jody
Sent: Wed 12/23/2015 8:24:02 PM
Subject: Re: U&O FIP

Yes, Cindy, thank you for that valuable addition that emphasizes "flexibility" to operators through the compliance schedule. It also implies that air quality might be improved prior to final designations, which is a positive message.

Thanks!

Jody

From: Beeler, Cindy
Sent: Wednesday, December 23, 2015 6:32 PM
To: Ostendorf, Jody; Rothery, Deirdre; Smith, Claudia; Dresser, Chris; Gilbert, Alexas
Cc: Daly, Carl
Subject: RE: U&O FIP

Jody –

Attached are my comments on that 4th bullet –see if that's what you were looking for.

All –

I reckon we should get a bullet in there that addresses the gas conserved as a result of this proposed rule:

- Some of the requirements of this proposed rule, such as retrofit of high-bleed pneumatics and leak detection and repair, result in natural gas being conserved and sent to market. EPA estimates that over 1.8 billion cubic feet of gas per year would be returned to market. This is enough natural gas to meet the energy needs of more than 78,000 U.S. homes annually.

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From: Ostendorf, Jody

Sent: Tuesday, December 22, 2015 11:32 AM

To: Rothery, Deirdre; Beeler, Cindy; Smith, Claudia; Dresser, Chris; Gilbert, Alexas

Cc: Daly, Carl

Subject: RE: U&O FIP

Hi All,

Please find attached draft talking points regarding the designation schedule vs. FIP schedule/effective date. Is there a better way to soften the fourth bullet, i.e. that the FIP controls will not be in place soon enough to impact the final designations classifications?

I appreciate your comments/suggestions.

Thanks,

Jody

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From: Rothery, Deirdre
Sent: Tuesday, December 22, 2015 9:10 AM
To: Beeler, Cindy <Beeler.Cindy@epa.gov>; Smith, Claudia <Smith.Claudia@epa.gov>;
Dresser, Chris <Dresser.Chris@epa.gov>; Gilbert, Alexas <Gilbert.Alexas@epa.gov>;
Ostendorf, Jody <ostendorf.jody@epa.gov>
Cc: Daly, Carl <Daly.Carl@epa.gov>
Subject: U&O FIP

Hi there,

As you know, we had a consultation with the Ute Tribe last week on Deseret and the U&O FIP. There will be a follow up consultation in early January (targeting the week of January 11th), to further discuss the FIP. In preparation for that meeting, we need to put together some talking points, which I am working on. However, it would be helpful if I could get a few bullets from you all to justify the FIP. Cost was one item that was brought up in the consultation (cost analysis, economic benefits, overall costs, push back from companies due to low oil prices), so a few bullets on what the costs are and where we got the data (based on national rules, Colorado rules etc) from would be helpful, expected AQ improvements, details on designation schedule vs. FIP schedule/effective date. Jody and Cindy, did I miss anything? I would need the bullets, at the latest, by January 4th, since we will need to get them to Shaun a week in advance of the consultation.

Thanks,

Dee